

LAUREN DI CHIARA
Attorney-at-Law

585 Stewart Avenue, L16
Garden City, NY 11530

Tel: (516) 695 – 6801

Email: laurendichiara.law@gmail.com
Admitted in SDNY, EDNY, USSC, NY & CT

June 24, 2022

Via ECF Filing

The Honorable Paul A. Engelmayer
United State District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Young, 21 Cr. 499 (PAE)

Dear Judge Engelmayer:

I along with John Kaley represent Frayvon Young in the above-referenced matter. I write now without opposition from the Government and Pretrial Services to request a modification to Mr. Young's bail conditions. The specific request is to remove the curfew requirement currently imposed upon Mr. Young. This will allow Mr. Young greater flexibility in working more hours at his job as those opportunities arise, often with little notice. Mr. Young continues to reside with his mother and is of great help to her financially and in the activities of daily living.

Mr. Young presently is on bail in the above-referenced matter with conditions of electronic monitoring with a curfew. Pretrial Services Officer Marlon Ovalles has advised Mr. Kaley that Mr. Young remains in compliance with no issues to report and that Mr. Young recently graduated from the Focus Forward Program. Furthermore, Officer Ovalles has informed Mr. Kaley that Pretrial consents to the removal of the curfew condition currently imposed upon Mr. Young. We have also communicated with AUSA Kedar Bhatia regarding this request. AUSA Bhatia has indicated in an email that the Government takes no position to the proposed modification to remove Mr. Young's curfew.

Thank you for the Court's consideration of this request.

Respectfully Submitted,

/s/ Lauren Di Chiara

CC: AUSA Kedar S. Bhatia
Pretrial Services Officer Marlon Ovalles
(both via ECF and email)

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 155.

6/27/2022

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge